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June 13, 2024

**VIA ECF**

Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 23A  
New York, New York 10007

Re: *The New York Times Co. v. Microsoft Corp. et al.* (23-cv-11195-SHS) and *Daily News, LP et al. v. Microsoft Corp. et al.* (24-cv-03285-SHS) - Oral Argument Request

Dear Judge Stein:

On behalf of the OpenAI defendants,<sup>1</sup> I write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on OpenAI's motion to consolidate the above referenced *New York Times* and *Daily News* matters.

Respectfully submitted,



Paven Malhotra

cc: All Counsel of Record (via ECF)

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<sup>1</sup> OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.